To: Mary Darling (Mary.n.darling@usace.army.mil)[Mary.n.darling@usace.army.mil]; Dan McMindes (daniel.c.mcmindes@usace.army.mil)[daniel.c.mcmindes@usace.army.mil]; Krongard, Gary R SPK[Gary.R.Krongard@usace.army.mil]; Fassero, Christopher A NWO[Christopher.A.Fassero@usace.army.mil]
From: Schmittdiel, Paula
Sent: Thur 4/23/2015 6:50:20 PM
Subject: FW: Paula's SOW for the USACE IA for Upper Animas project

All: FYI - Here is what our R8QA group has responded to Robin Coursen's request for their "check-off" on the documents for the new IA. My intent is to add a couple of sentences saying that all these issues are addressed in the QMP and/or the PMP that is being prepared and that USACE Sacramento and Omaha are working as a team under the Omaha QMP and that Omaha will have the responsibility for review and oversight of QA for the project.

I spoke with Robin and she will expect an email/evite for a conference call with Omaha QA official, Sacramento QA official and R8QA group. The earlier this discussion can take place the better since Robin will be on Agency travel out of the country starting May 8th. Thank you.

Paula Schmittdiel

Remedial Project Manager

U.S. Environmental Protection Agency

1595 Wynkoop St.

Denver, CO 80202

Office: 303-312-6861

Fax: 303-312-7151

Cell: 720-951-0795

From: Coursen, Robin
Sent: Thursday, April 23, 2015 9:01 AM
To: Schmittdiel, Paula
Subject: RE: Paula's SOW for the USACE IA for Upper Animas project

Paula, let's talk about this. Are you here today?

From: Brooks, Tom
Sent: Thursday, April 23, 2015 8:09 AM
To: Coursen, Robin
Cc: Himmelbauer, Linda
Subject: RE: Paula's SOW for the USACE IA for Upper Animas project

Hi Robin –

Paula has made a good start with this describing what needs to be done. I'm not sure how you're structuring your IA regarding work assignments – are they more formal (task orders/work assignments) or less? Either way, more details are needed. If less, documenting the requirements, roles, and responsibilities is more problematic (clarity and specificity) and should better be described in this SOW. A lot of the details noted below may seem to be obvious, but if not stated, roles/responsibilities could be misunderstood when executing the IA, and subsequently QA/project needs not adequately addressed.

The SOW should identify the Agency, name and approval date of the QMP. Note that Linda's title is Regional QA Manager. (I think QA Officer is the term used in the IA Manual, but RQAM should be used for us.) Based on the fact that you're preparing the IA for award, I'm presuming that USACE Omaha has agreed to manage the IA and oversight the QA for this? This should also be discussed in the SOW; clarify how the relationship between Omaha and Sacramento for QA will be handled. As I understand it, Sacramento will be doing a lot of the work and more detail for this beyond what is in the Omaha QMP should be provided.

I'm attaching our handout describing some items for POs to consider when negotiating IAs and writhing SOWs. I've copied the lists below and highlighted areas that **might** need more detail in the SOW language. Ref to QMP may be used if found there. It's better to have more detail than not enough, but clearly the level of detail required in a contract is not needed. Most of these can be covered in a sentence or phrase. Bullet lists might work too – EPA will, USACE will?

- Identify whether the agreement involves the generation or use of environmental data[1];
- Invoke EPA QA program requirements in the Agreement. Note that the other Agency may have additional QA requirements;
- Identify the QA documents that are required; See comment above re: identifying QMP
- Specify the QA roles and responsibilities and authorities for each Agency;

- Identify quality performance criteria for the agreement; - Details likely not known at this point, but can identify roughly source/roles for planning/determining, review, evaluation, that the will be specified in QAPPs
- Discuss in detail the QA requirements in the SOW including Region 8 QMP and QAPP requirements (including completed crosswalks); Include R8 QMP – Also identify what additional USACE QA requirements apply
- Identify whether the agreement involves Human Research Ethics (formerly known as Human Subjects Research) or Personally Identifiable Information. If so, the PO must ensure that EPA pre-award HSR requirements are met (contact Patti Tyler);
- The memo should also document the role(s) that other organizations (e.g., state) has in the project;- PRP? How do EPA and USACE interact with state/PRP?
- Address writes, reviews who and approves the QMP and QAPP; and
- Address who maintains and where project data will be stored. See below

The SOW may be written by EPA, the other Agency, a joint effort, or a contractor. Identify, for example:

- Short narrative describing project background, purpose & scope;
- Existing Approved QAPP title, revision & date (contractor, approving official); See Above
- Agency project contacts/leads; Who are the QA individuals involved for both EPA and USACE? Contractors?
- Deviations from QAPP, such as whether the other Agency will use procedures, methods as described in QAPP or the other Agency Manual. If the other Agency, document them and discuss equivalency to QAPP;
- Specify what the other Agency will do; clarify what they won't do, if relevant; Needs clarification – for example, it is not clear who is to write the QAPPs; any time frames for these (e.g. draft submit, comments addressed, final pared), EPA review/comment times, roles in planning projects, specify data validation requirements (Tier?) or state that this will be specified in each QAPP
- Specify what EPA will do; clarify what they won't do, if relevant. If a contractor is involved, discuss how the contractor fits into EPA's role; and Probably involves contractors from both agencies, should identify them if possible, and specify that each agency will manage its own contractors, including EPA QA requirements. EPA role in QA is unclear, oversight/management is not discussed – ref. previous IG reports) What role does EPA have in project planning?
- Include details such as basis for and selection of and number of samples, locations, parameters (field & lab & QC samples), shipping, lab selection, who provides supplies, assessments, corrective actions and data assessment. Document who will maintain what records and files, (including where data will be stored and maintained) and how USACE will provide them to EPA. It needs to be clear that all documents and records (as well as data – treatability studies – will be provided to EPA for Project file and SF Records

Everyone has a QA role and responsibility; we'll have to continue to work together to refine this process and learn what needs to be put into SOWs and what isn't. The information above put together quickly and I'm sure that I'm missing some things and over stating others, but I think it describes generally what needs to be included.

As always, I'm available for any questions that you or Paula may have.

Thanks,

Tom

Tom Brooks

Quality Assurance Program (8TMS-QA)

EPA Region 8, Denver, CO 80202

(303) 312-7291

From: Coursen, Robin
Sent: Tuesday, April 21, 2015 7:25 PM
To: Brooks, Tom
Subject: RE: Can you check this

Ok, that will work. I hope to have it done by Thurs or Fri and route it as I am going out of town.

From: Brooks, Tom
Sent: Tuesday, April 21, 2015 4:26 PM
To: Coursen, Robin
Subject: RE: Can you check this

Hi Robin –

It needs to more clearly describe who does what. I'll get back to you on this. It might be a day or so, if that works.

Tom Brooks

Quality Assurance Program (8TMS-QA)

EPA Region 8, Denver, CO 80202

(303) 312-7291

From: Coursen, Robin
Sent: Tuesday, April 21, 2015 4:03 PM
To: Brooks, Tom
Subject: Can you check this

Here is the cut and paste from Paula Schmittdiehl's SOW for the Upper Animas Project with USACE. Is this language adequate? If not, what would you add?

-

SCOPE OF SERVICES

All data generation work in this IA will be performed in accordance with a QMP approved by the Region 8 Quality Assurance Officer. A QAPP for each phase of work will be developed pursuant to EPA's quality assurance requirements and approved by an EPA Delegated Approving Official (DAO). This IA can be used to obtain the following services:

A. Field Work and Analytical Support

a. Provide resources necessary to conduct field investigation activities. This activity may include site reconnaissance, environmental sample collection, document review, and proper disposal of investigation-derived wastes.
b. Ensure that all environmental data collected or otherwise obtained meets EPA's quality assurance requirements.
c. Coordinate with EPA on the selection of analytical services,
d. Provide appropriate data validation services.
e. Provide data management support services (including technical deliverables) that address the collection, processing, management, distribution, analysis

and archival of data and information. The USACE will coordinate with EPA to ensure data is delivered in a format that complies with EPA's requirements.

f. Develop or update the site conceptual site model.

B. Remedial Investigation/Feasibility Study (RI/FS)

a. Conduct a preliminary review and identification of Federal/State Chemical and Location Specific Applicable Relevant and Appropriate Requirements (ARARs).
b. Assist EPA with the conduct of human health and ecological risk assessment activities to determine whether site contaminants pose an actual or potential future risk to human health and the environment in the absence of any remedial action. EPA Region 8 has risk assessment contractors to prepare the risk assessments.
c. Conduct a feasibility study to develop, screen, and evaluate cleanup alternatives that ensure the protection of human health and the environment and meet ARARs.
d. Conduct laboratory bench-scale, pilot scale or field-scale treatability studies to fully develop and analyze remedial alternatives.
e. Develop and deliver draft(s) and final remedial investigation and feasibility study reports and addenda.
f. Assist EPA with meeting the requirements of Section 106 of the National Historic Preservation Act.

C. Oversight or Oversight Support

a. Review implementation of work plans, sampling and analytical plans (SAP)/Quality assurance project plans (QAPPs) in the field.
b. Observe sampling activities for compliance with settlement documents, and approved SAPs/QAPPs.
c. Maintain a log of detailed observations at the site, including interactions with all parties, results of field tests and inspections, and observations about conformance with the project-specific plans and deviations from the approved plans.
d. Review and provide comments to EPA on the adequacy of PRP deliverables (plans, reports, data packages, etc.)
e. Prepare technical field oversight reports, which may include period reports and a final summary reports.

f. Support EPA in the oversight of the treatability study activities conducted by PRPs including the review of the treatability study work plan and QAPP, overseeing treatability study activities, and review the draft and final treatability study report.
g. Support EPA in the oversight of activities conducted by PRPs including but not limited to reviewing the RI or FS report, investigating remedial alternatives, and providing risk assessment support.

Robin Coursen

IA Specialist-Superfund

NEPA Practioner

1595 Wynkoop St.

Denver, CO 80202

(303) 312-6695

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[1] **Environmental Data** is defined as any measurements or information that describe environmental processes, location, or conditions; ecological or health effects and consequences; or the performance of environmental technology. Environmental data include information collected directly from measurements, produced from models, and compiled from other sources such as data bases or literature.